



State of Utah

Department of
Environmental Quality

Dianne R. Nielson, Ph.D.
Executive Director

DIVISION OF AIR QUALITY
Richard W. Sprott
Director

JON M. HUNTSMAN, JR.
Governor

GARY HERBERT
Lieutenant Governor

DAQE-IN0420005-05

February 7, 2005

Mike Neil
Advance Foam Plastics
111 West Fireclay Avenue
Murray, Utah 84107

Dear Mr. Neil:

Re: Intent to Approve: Modification to Approval Order to DAQE 693-98 to Permit Several
Unpermitted Existing Emission Points, Salt Lake County – CDS SM; NA; MAINT; HAPs
Project Code: N04200-005

The attached document is the Intent to Approve (ITA) for the above-referenced project. ITAs are subject to public review. Any comments received shall be considered before an Approval Order is issued.

Future correspondence on this Intent to Approve should include the engineer's name as well as the DAQE number as shown on the upper right-hand corner of this letter. Please direct any technical questions you may have on this project to Mr. Enqiang He. He may be reached at (801) 536-4010.

Sincerely,

Rusty Ruby, Manager
New Source Review Section

RR:HE:re

cc: Salt Lake Valley Health Department
Mike Owens, EPA Region VIII

STATE OF UTAH

Department of Environmental Quality

Division of Air Quality

**INTENT TO APPROVE: Modification to Approval Order
DAQE 693-98 to Permit Several Unpermitted Existing
Emission Points**

**Prepared By: Enqiang He, Engineer
(801) 536-4001
ehe@utah.gov.**

INTENT TO APPROVE NUMBER

DAQE-IN0420005-05

Date: February 7, 2005

Advance Foam Plastics

**Source Contact
Mike Neil
(801) 265-3465**

**Richard W. Sprott
Executive Secretary
Utah Air Quality Board**

Abstract

Advance Foam Plastics, Inc., operates an expandable polystyrene resin plant located in Salt Lake County, which is a nontainment area for PM₁₀ and SO₂, and a maintenance area for ozone. The company has submitted a Notice of Intent to (1) add a diesel fuel powered emergency pump, replace the boiler with a larger one, and include wire cutters, and (2) remove redundant requirements in Condition #8 of AO (DAQE-693-98). New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAP) and Maximum Available Control Technology (MACT) regulations do not apply to this source. Title V of the 1990 Clean Air Act does not apply to this source.

The emissions, in tons per year, will increase as follows: PM₁₀ 0.12, NO_x 0.00, SO₂ 0.01, CO 0.76, VOC 0.00, and HAPs 0.10. The changes in emissions will result in the following, in tons per year, potential to emit totals: PM₁₀ = 0.21, NO_x = 1.84, SO₂ = 0.02, CO = 1.15, VOC = 95.00, and HAPs = 0.10.

The Notice of Intent (NOI) for the above-referenced project has been evaluated and has been found to be consistent with the requirements of the Utah Administrative Code Rule 307 (UAC R307). Air pollution producing sources and/or their air control facilities may not be constructed, installed, established, or modified prior to the issuance of an Approval Order (AO) by the Executive Secretary of the Utah Air Quality Board.

A 30-day public comment period will be held in accordance with UAC R307-401-4. A notice of intent to approve will be published in the Salt Lake Tribune and Deseret News on February 12, 2005. During the public comment period the proposal and the evaluation of its impact on air quality will be available for both you and the public to review and comment. If anyone so requests a public hearing it will be held in accordance with UAC R307-401-4. The hearing will be held as close as practicable to the location of the source. Any comments received during the public comment period and the hearing will be evaluated.

Please review the proposed AO conditions during this period and make any comments you may have. The proposed conditions of the AO may be changed as a result of the comments received. Unless changed, the AO will be based upon the following conditions:

General Conditions:

1. This Approval Order (AO) applies to the following company:

Site Office

Advance Foam Plastics, Inc.
111 West Fireclay Ave.
Murray, Utah 84107

Phone: (801) 265-3465
Fax: (801) 265-3542

The equipment listed in this AO shall be operated at the following location:

Same as above

Universal Transverse Mercator (UTM) Coordinate System: UTM Datum NAD27
4,503.2 kilometers Northing; 424.5 kilometers Easting; Zone 12

2. All definitions, terms, abbreviations, and references used in this AO conform to those used in the Utah Administrative Code (UAC) Rule 307 (R307) and Title 40 of the Code of Federal Regulations (40 CFR). Unless noted otherwise, references cited in these AO conditions refer to those rules.
3. The limits set forth in this AO shall not be exceeded without prior approval in accordance with R307-401.
4. Modifications to the equipment or processes approved by this AO that could affect the emissions covered by this AO must be reviewed and approved in accordance with R307-401-1.
5. All records referenced in this AO, which are required to be kept by the owner/operator, shall be made available to the Executive Secretary or Executive Secretary's representative upon request, and the records shall include the two-year period prior to the date of the request. Records shall be kept for the following minimum periods:
 - A. Emission inventories Five years from the due date of each emission statement or until the next inventory is due, whichever is longer.
 - B. All other records Two years
6. Advance Foam Plastics shall conduct its operations of the expandable polystyrene resin plant in accordance with the terms and conditions of this AO, which was written pursuant to Advance Foam Plastics' Notice of Intent submitted to the Division of Air Quality (DAQ) on November 26, 2004.
7. This AO shall replace the AO (DAQE-693-98) dated October 19, 1998.
8. The approved installations shall consist of the following equipment:
 - A. One (1) densifier
 - B. Pre-expander, bead storage bags*, and block molding equipment
 - C. Packaging storage bags* and two (2) packaging expanders (one expander* newly permitted)
 - D. Misc. wire cutters*
 - E. One (1) diesel powered fire sprinkler pump rated at 160 BHP*
 - F. One (1) natural gas boiler rated at 8.4 MMBtu/hr*

* Newly permitted equipment.

Limitations and Tests Procedures

9. Visible emissions from the following emission points shall not exceed the following values:

- A. The diesel powered fire sprinkler pump - 20% opacity
- B. The natural gas boiler - 10% opacity
- C. All other points - 10% opacity

Opacity observations of emissions from stationary sources shall be conducted according to 40 CFR 60, Appendix A, Method 9.

10. The diesel powered fire sprinkler pump shall be used only in the event of a fire and during regular maintenance of the pump. Records documenting pump usage shall be kept in a log and they shall show the date the pump was used, the duration in hours of the pump usage, and the reason for each pump usage.

Fuels

11. The owner/operator shall use natural gas in the boiler and #2 diesel fuel in the pump.

Volatile Organic Compound (VOC) Limitation

12. The plant-wide emissions of VOCs shall not exceed:

95.00 tons per rolling 12-month period

Compliance with the limitation shall be determined on a rolling 12-month total. Based on the twentieth day of each month, a new 12-month total shall be calculated using data from the previous 12 months.

The VOC emissions shall be determined by maintaining a record of VOC emitting materials used each month. The record shall include the following data for each material used:

- A. Names of all VOC emitting materials.
- B. Amount and location of materials containing VOCs used on a monthly basis and summed for every location and for the entire plant each month.
- C. Percent by weight of all VOCs in each material used and VOCs retained in the manufactured product shall be tested if directed by the Executive Secretary. The test method shall be approved by the Executive Secretary.
- D. The amount of VOCs emitted monthly by each material used shall be calculated by the following procedure:

$$\text{VOC} = \frac{\% \text{ VOC by Weight}}{100} \times [\text{VOC emitting material used}]$$

- E. The amount of VOCs, shipped out as hazardous waste, or retained in the manufactured product for the month shall be similarly quantified and subtracted from the quantities calculated above to provide the monthly total VOC emissions.

Records & Miscellaneous

13. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any equipment approved under this Approval Order including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Executive Secretary which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. All maintenance performed on equipment authorized by this AO shall be recorded.
14. The owner/operator shall comply with R307-150 Series. Inventories, Testing and Monitoring.
15. The owner/operator shall comply with R307-107. General Requirements: Unavoidable Breakdowns.

The Executive Secretary shall be notified in writing if the company is sold or changes its name.

This AO in no way releases the owner or operator from any liability for compliance with all other applicable federal, state, and local regulations including R307.

A copy of the rules, regulations and/or attachments addressed in this AO may be obtained by contacting the Division of Air Quality. The Utah Administrative Code R307 rules used by DAQ, the Notice of Intent (NOI) guide, and other air quality documents and forms may also be obtained on the Internet at the following web site:

<http://www.airquality.utah.gov/>

The annual emissions estimations below include the boiler and all VOC emitting processes associated with the plant. These emissions are for the purpose of determining the applicability of Prevention of Significant Deterioration, non-attainment area, maintenance area, and Title V source requirements of the R307. Except for VOCs, they are not to be used for determining compliance.

The Potential To Emit (PTE) emissions for Advance Foam Plastics are currently calculated at the following values:

	<u>Pollutant</u>	<u>Tons/yr</u>
A.	PM ₁₀	0.21
B.	SO ₂	0.02
C.	NO _x	1.84
D.	CO	1.15
E.	VOC	95.00
F.	All HAPs combined	0.10

The Division of Air Quality is authorized to charge a fee for reimbursement of the actual costs incurred in the issuance of an AO. An invoice will follow upon issuance of the final Approval Order.

Sincerely,

Rusty Ruby, Manager
New Source Review Section

